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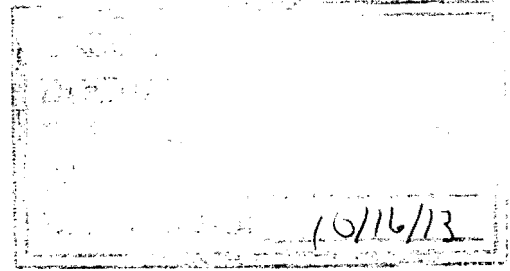
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October 15, 2013

VIA E-MAIL AND LNF&S

The Honorable Shira A. Scheindlin
United States District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1620
New York, New York 10007-1312



**Re: Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358 (SAS)
New Jersey Dep't of Env't'l Prot., et al. v. Atlantic Richfield Co., et al.
No. 08-CIV-00312**

Dear Judge Scheindlin:

Defendants Atlantic Richfield Company ("Atlantic Richfield") and BP Products North America Inc. ("BP Products" and collectively, the "BP Defendants") respectfully request an extension of time to file a stipulated dismissal to October 31, 2013. Counsel for the BP Defendants met-and-conferred with Plaintiffs' counsel and they agree with this extension.

In their pre-motion letter, the BP Defendants indicated that they planned to move for summary judgment to dismiss certain BP entities, including BP America Inc., BP Amoco Chemical Company and BP Corporation North America Inc., because they were not directly involved in the refining, distribution or marketing of gasoline, including gasoline with MTBE. In response, Plaintiffs indicated that they would discuss this with counsel for the BP Defendants and would most likely dismiss these BP entities.

At the pre-motion conference on August 19, 2013, the Court ordered that all stipulated dismissals should be filed by September 3, 2013. On August 22, 2013, the Court ordered the BP Defendants to file their summary judgment motion on October 15, 2013. Although the parties have been working diligently to meet-and-confer and file a stipulated dismissal, the parties request additional time to address and resolve any outstanding issues. Specifically, the parties request an extension of time file a stipulated dismissal to October 31, 2013. If the parties agree to dismiss BP America Inc., BP Amoco Chemical Company and BP Corporation North America Inc., the BP Defendants do not intend to file a motion for summary judgment at this time.

*The BP Defendants shall have until October 31, 2013
to file any stipulated dismissal
So Ordered. [Signature] 10/16/13*

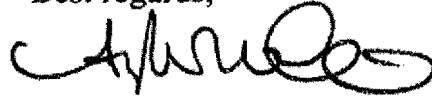
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In advance, thank you for your time and consideration.

Best regards,

A handwritten signature in black ink, appearing to read 'Sylvia Winston', with a stylized, cursive script.

Sylvia Winston

cc: *All Counsel via LNF&S*

Dated: October __, 2013

SO ORDERED

Shira Scheindlin
United States District Court